

Magistrate Judge Donohue

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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

MJ12-230
DOCKET NO.

UNITED STATES OF AMERICA,

Plaintiff,

v.

CODY R. INGRAM,

Defendant.

COMPLAINT for VIOLATIONS
of Title 18, United States Code, Section
1361

BEFORE, James P. Donohue, United States Magistrate Judge, Seattle, Washington.

The undersigned complainant, Geoffrey Maron, Special Agent, Federal Bureau of Investigation, being duly sworn, states:

COUNT ONE

(Destruction of Government Property)

On or about May 1, 2012, Seattle, within the Western District of Washington, CODY R. INGRAM did willfully injure and commit a depredation, and did attempt to injure and commit a depredation, against property of the United States and a department and agency thereof, that is, the General Services Administration, to wit, property at the William Kenzo Nakamura United States Courthouse, 1010 Fifth Avenue, Seattle, Washington.

All in violation of Title 18, United States Code, Section 1361 and Section 2.

1 And the complainant states that this Complaint is based on the following information:

2 **Background**

3 1. I have been a Special Agent ("SA") of the Federal Bureau of Investigation ("FBI")
4 since 2003. I am trained and experienced in investigating a wide variety of violations of federal
5 criminal law. I am currently assigned to the FBI's Seattle office, and I work on the Joint
6 Terrorism Task Force ("JTTF").

7 2. The information in this affidavit is based on my direct knowledge and information
8 provided by other law enforcement sources. This affidavit does not include everything that I
9 learned during the investigation, but rather only includes enough information to show probable
10 cause.

11 **The Nakamura United States Courthouse**

12 3. I am investigating the vandalism and destruction of United States Government
13 property at the William Kenzo Nakamura United States Courthouse, 1010 Fifth Avenue, Seattle,
14 Washington (the "Nakamura Courthouse"). I have spoken with Donna Sweeney of the United
15 States General Services Administration ("GSA"). The GSA is a federal agency that acts as the
16 landlord for federal government property. The GSA is responsible for managing and
17 maintaining federal buildings. Ms. Sweeney is the GSA property manager, and is responsible for
18 managing GSA properties to include the Nakamura Courthouse. According to Ms. Sweeney, the
19 Nakamura Courthouse is, and has always been, federal property owned by the United States
20 Government.

21 **The May 1, 2012, Vandalism Of The Nakamura Courthouse**

22 4. Large public "May Day" demonstrations and marches took place in Seattle on May
23 1, 2012. At other recent demonstrations, suspected anarchists have rioted and destroyed
24 property. On May 1, 2012, I and other officers were responsible for preventing and responding
25 to any criminal activity.

26 5. From my own observations, and from other law enforcement sources, I know that a
27 crowd of demonstrators reached the Nakamura Courthouse at roughly 12:50 p.m. The
28 Courthouse was vandalized during the demonstration. Several doorpanes and windows were

1 broken, and paint was thrown on the building.

2 6. I have seen video of the vandalism of the Nakamura Courthouse that was taken by
3 a local television station. The video shows several unidentified people dressed in black (known
4 as "black bloc" attire) running up to the doors on the Sixth Avenue side of the Courthouse. The
5 "black bloc" vandals batter the doors with objects. The "black bloc" vandals then run back into
6 the crowd of demonstrators. A man in dark shirt then runs up to a door and batters it with a pole.
7 As the man in the dark shirt turns and heads back to the crowd, CODY R. INGRAM runs up to
8 the building. I have met INGRAM and I recognize him as the man in the video. INGRAM is a
9 thin white man with long dreadlocks, and is wearing pants, a dark sweatshirt, and a cap in the
10 video. As INGRAM approaches the building, he picks up a stout stick that is lying on the
11 ground. INGRAM uses the stick to deliver half a dozen or so sharp jabs to a glass doorpane.
12 The doorpane itself is hidden from view due to the camera angle. INGRAM then turns and
13 walks back to the crowd of demonstrators, still carrying the stick.

14 7. From watching the video, I can tell what doors INGRAM struck. I have been to
15 the Nakamura Courthouse and confirmed that those doorpanes are broken. I have also seen that
16 the Courthouse is clearly marked as a federal Government building. The following appears
17 directly over the doors that were vandalized, in very large letters:

18 WILLIAM KENZO NAKAMURA
19 UNITED STATES COURT HOUSE
20 U.S. COURT OF APPEALS

21 8. INGRAM was arrested by Seattle Police Department ("SPD") Officer Keith
22 Swank. According to Officer Swank's report, he was on bicycle patrol at about 12:53 p.m. when
23 he heard a report over his radio that people were breaking windows at the Nakamura
24 Courthouse. The suspects were described as white men in dark clothes. As Officer Swank
25 approached the Courthouse, he saw INGRAM on Sixth Avenue carrying a long stick with a flag
26 on it. Officer Swank rode up to INGRAM, identified himself, and ordered INGRAM to stop.
27 INGRAM turned and clenched his fists, as if about to fight the officer. Officer Swank got off
28 his bicycle. INGRAM ran north on Sixth Avenue. Other officers caught up with INGRAM and

1 stopped him.

2 9. Even after being stopped, INGRAM refused to drop his stick. Officers tried to
3 take the stick away and INGRAM struggled with them. Officer Swank pulled INGRAM to the
4 ground by his hair. INGRAM kept struggling. Eventually the officers cuffed him. INGRAM
5 continued to resist as officers put him in a police van.

6 7 **INGRAM's Post-Arrest Statements**

8 10. JTTF Task Force Officer ("TFO") Rik Hall and I interviewed INGRAM on the
9 night of May 1, 2012. INGRAM was in custody at the King County Jail on state charges. We
10 identified ourselves as federal agents and read INGRAM his *Miranda* rights. INGRAM said that
11 he understood his rights and was willing to answer questions.

12 11. INGRAM told us that he lived in Vermont. INGRAM said that he had travelled
13 across the country with his dog to participate in Seattle's May Day demonstrations. INGRAM
14 said that he was a schizophrenic but claimed that he did not need to take medications because his
15 dog was a "service dog." INGRAM said that received a citation in Oregon while on his way to
16 Seattle. INGRAM said that, on May 1, 2012, he joined a group of demonstrators that was
17 forming at Seattle's Westlake Park. INGRAM left his dog and his backpack with two people he
18 knew only as "Scarecrow" and "Wolf," whom he had met earlier in the week. INGRAM then
19 joined a group of marchers. The marchers eventually reached the Nakamura Courthouse.

20 12. INGRAM admitted to breaking a window at the Nakamura Courthouse. INGRAM
21 claimed that the window was already damaged or "spidered" when he struck it. From the media
22 video, it is possible that one of the black-clad vandals may have struck the window before
23 INGRAM did. INGRAM claimed that he broke the "spidered" window because he wanted to
24 keep people from getting hurt. From my review of the video, I saw no signs that INGRAM was
25 cleaning up broken glass or doing anything else that would keep people from getting hurt.
26 INGRAM repeatedly said, "I broke the window." INGRAM said that he was anti-Government
27 and was angry at the Government. INGRAM said that the Government needs to be replaced
28 rather than changed.

14. Based on the foregoing, I respectfully submit that CODY R. INGRAM committed the crime alleged in Count 1, above, incorporated herein by reference.

Based on the Complaint and Affidavit sworn to before me, and subscribed in my presence, the Court hereby finds that there is probable cause to believe the defendant committed the offense set forth in the Complaint.

HON. JAMES P. DONOHUE
UNITED STATES MAGISTRATE JUDGE